

UNITED STATES DISTRICT COURT

2nd TIME
SENT

for the
DISTRICT OF SOUTH CAROLINA
GREENVILLE Division

2nd TIME
SENT

UNITED STATES OF AMERICA

v.

DENNIS D. BROOKS
BARBARA D. BROOKS,
GREENVILLE COUNTY TAX COLLECTOR, See Attached

) Case No. Civil Action No. 6-17-cv-2010-TMC
)
)
)
)

) Jury Trial: Yes
)
)
)
)

) DEFENDANTS' FIRST OBJECTION
) TO SUMMARY JUDGMENT
)
)

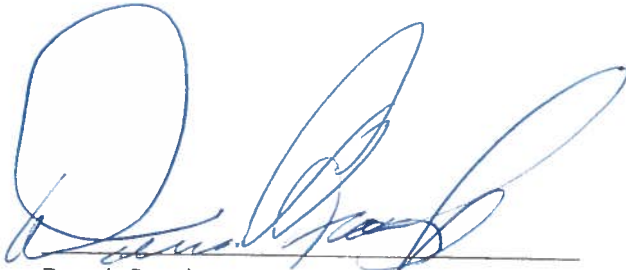
Dennis D. and Barbara D. Brooks
10 Twin Oaks Court
Greenville, Greenville County
South Carolina 29615
(864) 288-4303, Hm

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Objection to Summary Judgement

1. Summary Judgment failed to recognize the cost basis of mutual funds which were presented in the 2000 tax return and verified in an affidavit by the stock broker.
2. DOJ failed to recognize the affidavit of the stock broker which verified all cost basis used in the tax return.
3. Summary Judgment failed to recognize affidavit submitted by US Postal employee, Lynn Jones, that verified he had mailed tax returns for the defendant, starting in 2007 through 2017.
4. DOJ failed to comply with request for all discovery.
5. Defendants request a hearing no later than August 30, 2019.



Dennis Brooks



Barbara Brooks